

**BEFORE THE PUBLIC UTILITIES COMMISSION OF  
THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's Own Motion to improve distribution level interconnection rules and regulations for certain classes of electric generators and electric storage resources.

Rulemaking 11-09-011  
(Filed September 22, 2011)

**COMMENTS OF  
THE OFFICE OF RATEPAYER ADVOCATES  
TO THE SMART INVERTER WORKING GROUP PHASE 2  
RECOMMENDATIONS & WORKSHOP  
HELD ON OCTOBER 27, 2014**

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November 10, 2014

## **I. INTRODUCTION**

On October 27, 2014, the Commission held a workshop to discuss the Smart Inverter Working Group (SIWG) document, *Draft Recommendations for Utility Communications with Distributed Energy Resources (DER) Systems with Smart Inverters*. The Draft Recommendations include the SIWG's Phase 2 communications protocols as required by the Assigned Commissioner's Amended Scoping Memo and Ruling in this proceeding, dated May 13, 2014.<sup>1</sup> The Amended Scoping Memo directed the SIWG to "file and serve a proposed description of issues ready for Commission resolution and a proposed schedule for these issues no later than July 18, 2014,"<sup>2</sup> and for the Commission to hold a workshop to discuss the issues. Pursuant to the directions and the schedule in the October 27 Workshop Agenda, ORA submits the following comments.

## **I. ORA's COMMENTS**

The workshop agenda asked for comments in two parts: 1) Editorial Comments, and 2) Substantive Comments.

### **PART 1: EDITORIAL COMMENTS**

ORA has no comments on this section.

### **PART 2: SUBSTANTIVE COMMENTS**

ORA disagrees with the SIWG that "general cyber security requirements should be covered in Rule 21."<sup>3</sup> Rule 21 covers the interconnection process and cyber security is beyond the scope of this process. Cyber security technical specifications and security procedures should be contained in a separate handbook or guide. Language dealing with cyber security in Rule 21 should be restricted to a general mention of the kind of cyber

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<sup>1</sup> *Assigned Commissioner's Amended Scoping Memo and Ruling Requiring Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company to File Proposed Revised Electric Tariff Rule 21*, dated May 13, 2014 in Rulemaking (R.) 11-09-011. ("Amended Scoping Memo")

<sup>2</sup> *Id.* at 6-7.

<sup>3</sup> *Draft Recommendations for Utility Communications with Distributed Energy Resources (DER) Systems with Smart Inverters. Smart Inverter Working Group Phase 2 Recommendations* at p. 12.

security requirements that should be followed (such as those that are set up by the military, government or other entity) and then refer the reader to that separate set of rules or regulations for cyber security. Additionally, the inclusion of cyber security features in Rule 21 tariffs could require numerous updates to Rule 21 should cyber security features change rapidly in the future as new technology emerges. Thus, instead of covering general cyber security requirements in Rule 21, ORA agrees with the SIWG that “specific cyber security requirements may be included in utility handbooks or auxiliary documents.”<sup>4</sup>

### **III. CONCLUSION**

ORA respectfully requests that its suggestion above be adopted.

Respectfully submitted,

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<sup>4</sup> *Id.*